

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\*\*\*\*\*

UNITED STEELWORKERS OF \*  
AMERICA, AFL-CIO/CLC, \*

Plaintiff, \*

v. \*

PLIANT CORPORATION, \*

Defendant. \*

CIVIL ACTION NO. 04-12489-WGY

\*\*\*\*\*

**MOTION FOR ADMISSION OF ATTORNEY**  
**TOBIAS EDWARD SCHLUETER PRO HAC VICE**

NOW COMES Susan G. Fentin, Esq., and moves for the admission of Attorney Tobias Edward Schlueter, pro hac vice in this matter, pursuant to Local Rule 83.5.3(b).

In support of this Motion, the undersigned submits the Affidavit of Attorney Tobias Edward Schlueter, which is attached hereto as Exhibit A. The firm of Skoler, Abbott & Presser, P.C., will remain as local counsel in this matter.

DATED at Springfield, Massachusetts, this 4th day of April 2005.

Respectfully Submitted,

/s/ Susan G. Fentin

Susan G. Fentin, Esq.

BBO No. 632962

Counsel for Defendant

Skoler, Abbott & Presser, P.C.

One Monarch Place, Suite 2000

Springfield, Massachusetts 01144

Tel.: (413) 737-4753/Fax: (413) 787-1941

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the above document was served upon Plaintiff's counsel, Warren H. Pyle and Nicole Horberg Decter, Pyle, Rome, Lichten, Ehrenberg & Liss-Riordan, P.C., 18 Tremont Street, Suite 500, Boston, MA 02108, via electronic filing and first-class, U.S. mail, postage prepaid on April 4, 2005.

/s/ Susan G. Fentin  
Susan G. Fentin, Esq.

# **EXHIBIT A**

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CIVIL ACTION NO. 04-12489-WGY

\*

PLIANT CORPORATION, \*

Defendant. \*

\*

\*\*\*\*\*

**AFFIDAVIT OF TOBIAS EDWARD SCHLUETER IN SUPPORT OF**  
**MOTION FOR ADMISSION PRO HAC VICE**

I, TOBIAS EDWARD SCHLUETER, having been duly sworn, do hereby state:

1. My residence is 2024 Antietam Court, Aurora, Illinois 60504.
2. My principal office is at Sonnenschein Nath & Rosenthal LLP, 8000 Sears Tower, Chicago, IL 60606.
3. I have been admitted to practice in the state court of Illinois since 2002.
4. I have been admitted to practice in the United States District Court for the Northern District of Illinois since 2002.
5. I am admitted to practice in the Seventh Circuit Court of Appeals since 2002.
6. I am not subject to disciplinary action in any jurisdiction, and am a member of good standing of the bar.
7. Neither I nor any member of the firm to which I belong has been denied admission to any court or disciplined in accordance with Local Rule 83.6 of the United States District Court for the District of Massachusetts.
8. I am familiar with the Local Rules of the United States District Court for the

## District of Massachusetts.

9. I and my firm represent the Defendant in a case involving alleged violation of the Worker Adjustment and Retraining Notification Act, 29 U.S.C. § 2101, et. seq.

I swear that the above is true.

Respectfully Submitted,

Tobias Edward Schlueter, Esq.  
Sonnenschein Nath & Rosenthal LLP  
8000 Sears Tower  
Chicago, IL 60606  
Telephone: (312) 876-8000  
Fax: (312) 876-7934

Dated: March 29, 2005

Sworn to and Subscribed to me before  
this 29th day of March, 2005.

Spannif  
Notary Public  
My Commission Expires: 4|23|05